1	Case 1:07-cv-05691-NRB Documents	6-24 1	4 Filed 09/03/2008 Page 1 of 7 Page 40
上2	Q To the best of your ability, this is	2	challenging.
,	the contact information for these two	3	Q When did you make that search for
4	gentlemen?	4	your tax returns?
5	A Yes.	5	A I don't know specific dates
6	Q You had that information in 2006,	6	offhand.
8	right? A Yes.	7 8	Q Give me the best approximation you can.
9	Q So you would have had it after 2006,	9	A I can't even do that.
10	also, correct?	10	Q Where were you living at the time?
11	A That would be hard to say.	11	A September 6?
12	This could have been in storage.	12	Q No, when you were looking for your
13	When I had to get out of my apartment, it was in	13	tax returns.
14	storage, and I did not have access.	14	Where were you living at the time you
15	Q Are there documents that remain in	15	were looking for your tax returns?
16	storage that may pertain to anything relating to	16	A Well, I would be able to let you
17 18	this case, meaning your employment with Plus One	17	know, if I knew when I was searching for the tax
19	or anything else you discussed in your complaint?	18 19	information.
20	A There could be. I have not gone	20	Q So where you were living is not going to help you?
21	through.	21	A Yes.
22	I just got into town a few days ago.	22	Q Did you look for your tax returns
23	I have not been able to go all through myself.	23	before the complaint was filed?
24	Q Were you aware documents were	24	A Before I filed the E.E.O.C. charge?
25	requested of you in January 2008?	25	Q Sure, yes.
1			
L.,	Page 39		Page 41
ا د ع	39	1	41
2 3	39 A Specifically, what documents?	2	41 A No.
3	39 A Specifically, what documents? Q Any documents?	2 3	A No. Q Do you know when you filed your
3	39 A Specifically, what documents? Q Any documents? A 2008 of this year?	2 3 4	A No. Q Do you know when you filed your complaint in federal court?
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3 4 5 6 7 8	A Specifically, what documents? Q Any documents? A 2008 of this year? Q Yes, ma'am. A I don't believe there is a request	2 3 4 5 6	A No. Q Do you know when you filed your complaint in federal court? A No, I don't. Q Are you aware that you filed three
3 4 5 6 7 8 9	A Specifically, what documents? Q Any documents? A 2008 of this year? Q Yes, ma'am. A I don't believe there is a request for anything. I mean, I would have to look at my e-mail account. I really have to check my	2 3 4 5 6 7	A No. Q Do you know when you filed your complaint in federal court? A No, I don't. Q Are you aware that you filed three different ones?
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1	Case 1:07-cv-05691-NRB Docu f ৰঞ্জাঞ্জি 98	\$6-24 1	4 Filed 09/03/2008 Page 2 of 7 Page 100
2	Q Between the 5th and today, did you	2	prepare for your deposition, did you look at any
1-5	meet with your attorneys?	3	documents?
, 4	Don't tell me substance. Just tell	4	MR. UMOH: Objection.
5	me yes or no.	5	A It was verbal.
6	A Yes.	6	Q I am not permitted, and I am not
7	Q When?	7	trying to go into content of the discussion you
8	A Saturday, August 9.	8	had with your lawyers.
9	Q And for how long did you meet with	9	A I just remember us talking.
10	your attorneys on Saturday, August 9?	10	Q Please tell me in chronological
11	A I know it was about at least a half	11	order, to the best you can, where, if anywhere,
12	hour.	12	you have been employed since June 16, 2006.
13	Q Was it more than an hour?	13	A Since 2006?
14	A I was not checking my watch. I don't	14	Q Yes, ma'am.
15 16	know whether I was in there for an hour. Q Was it more than two hours?	15	A I have been employed at P.I.C.
17	Q Was it more than two hours? A No.	16 17	Resort. I have been employed at
18	Q To prepare for your deposition, did	18	well, I have a question. Independent contractor, or just an employee?
19	you review any documents?	19	Q We will split them up.
20	A What I did, I looked at not with	20	As an employee, first.
21	my lawyer, on my own, I looked at some of my own	21	A P.I.C. Resort, Holiday Temp
22	paperwork by myself. I wanted to make sure I	22	Services.
23	was accurate with giving my answers, and	23	I remember receiving unemployment,
24	familiar, because this has been going on for	24	but I would have to look at my tax return to
25	quite some time.	25	know all the other employers, because I
*	Page 99	۱,	Page 101
- . 2	99	1	101
2 3	99 Q What papers did you look at?	2	101 definitely got a W-2, so I have to look at my
3	99 Q What papers did you look at? A The E.E.O.C. charge.	2 3	definitely got a W-2, so I have to look at my taxes.
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1	Case 1:07-cv-05691-NRB Docume কাই 102	6-2	4 Filed 09/03/2008 Page 3 of 7 Page 104
2	those and provide them to us.	2	A Now I remember.
```	MR. UMOH: Take it under	3	What it was, I got an assignment at a
. 4	advisement.	4	company in Brooklyn, but then they had layoffs.
5	Q When was the last time you tried to	5	They laid me off right after Christmas. So
6	contact Mr. Lauler to get your tax returns?	6	that's why I contacted Holiday Temp Services, to
7	A It had to be during my employment	7	get another job.
8	while I was in Guam.	8	Q I am sorry.
9	I know I did not file my taxes for	9	Who laid you off around Christmas?
10	2007 and 2006 until recently. I believe it was	10	A Novel Box Company.
11	even after April 15 of this year. It could have	11	Q Were you employed by Novel Box
12	been late spring, early summer.	12	Company, or were you working for them as an
13	But I know I reached out to him. I	13	independent contractor?
14	sent him a couple of e-mails.	14	A I am trying to remember if they took
15	He never responded in sending all my	15	taxes out or not. I am not sure about that, but
16	tax returns. I never got 2006.	16	my taxes would have that information.
17	Q Did you get 2007?	17	I don't know if I signed a W-4 form
18	A I know I got part of it. I have to	18	or not, but it should be reflected in my taxes.
19	check my e-mail again.	19	I am sorry. I keep being
20	He was busy, or whatever.	20	repetitive.
21	Maybe he was waiting for a payment.	21	Q When did you work for Novel Box?
22	Q Was he waiting for a payment?	22	A It was around Christmastime.
23	A No, because I had paid him in	23	Q Christmas of what year?
24	advance.	24	A End of 2007 to the beginning of
25	I submitted it close to I don't	25	2008.
	Page 103	,	Page 105
	103	1	105
2	103 remember when I was able to give him all of the	2	105 Q How long did you work for them?
3	103 remember when I was able to give him all of the information about my taxes, but I do know that	2 3	105 Q How long did you work for them? A It could not have been more than a
3 4	remember when I was able to give him all of the information about my taxes, but I do know that when I submitted all the information to him, he	2 3 4	Q How long did you work for them? A It could not have been more than a few months, even if it was that.
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3 4 5 6	remember when I was able to give him all of the information about my taxes, but I do know that when I submitted all the information to him, he said, Well, you will have to wait, because it's crunch time. He has a lot. Don't worry.	2 3 4 5 6	Q How long did you work for them? A It could not have been more than a few months, even if it was that. Q Was it full time or part time? A It was full time.
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1	106	1	108
<u>L</u> 2	Q What did you do for them?	2	Q Miss Mann, please look at what the
1	A They took me on as a graphic	3	reporter has marked as Exhibit 15. And just let
5	designer.  Q And what did you do for them as a	5	me know when you are finished reviewing it, please?
6	graphic designer?	6	A Okay.
7	A I was editing their jewelry	7	Q Have you ever seen that document
8	catalogue.	8	before?
9	Q Were you editing text or graphics?	9	A I don't recall, but I know the
10	A Both.	10	information, I have.
11	Q And what was your compensation	11	Q Just so I am clear, I am not asking
12	arrangement with them?	12	about the information. I want to know if you
13	A I got paid weekly.	13	have seen that document before.
14	Q Did you get paid a set amount weekly,	14	A I don't recall.
15	or did it vary?	15	Q Is there anything that would help you
16	A It varied.	16	remember?
17	Q And what did it vary on?	17	A I can't think of anything at this
18	A Whether the office was open or not.	18	point that would help me remember.
19	Q Did you ever do work at home, or did	19	Q You mentioned your e-mails several
20 21	you do it all at the office?  A I worked at home, but I did not get	20	times. Would your e-mails help you remember?
22	A I worked at home, but I did not get paid for working at home. I did it because I	21 22	A Looking through some of the information, I know that I have e-mailed some of
23	wanted to	23	this information to my lawyer, yes.
24	Q So if the office was closed, is it	24	Q My question is, are there e-mails
25	accurate you would not get paid, even if you	25	that would help you remember whether you have
			and would help you remember michief you have
上。	Page 107		Page 109
上 . . 2	107	1	109
2   3	107 worked at home while the office was closed; is	2	seen this document before?
3	107 worked at home while the office was closed; is that correct?	2 3	seen this document before?  A Not that I can recall, not
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E			
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1	202		204
2	MR. UMOH: We showed up at	2	Plaintiff has been produced so far
1	1:00, and we were sitting downstairs	3	for seven hours of deposition.
<del> </del>	for a half hour.	4	We feel the deposition with
5	MS. NORCROSS: I came in at	5	Plus One is concluded.
6	1:00, and there was no one there.	6	MS. NORCROSS: We have the
7	MR. UMOH: Off the record.	7	court reporter here. The actual
8	(Discussion off the record)	8	deposition time has been something
9	MR. UMOH: This is Plaintiff's	9	just under six hours, but call it
10	counsel. And we are in the middle of	10	six.
11	the deposition, and we would like the	11	My intent at this point is to
12	judge to resolve it, if possible.	12	finish up one line and then let
13	THE LAW CLERK: The judge is	13	Mr. Derschowitz start. We are going
14	not available now.	14	to be going until whenever.
15	MR. UMOH: The judge allocated	15	THE LAW CLERK: The judge is
16	10 hours for the deposition today and	16	on the bench.
17	an unspecified amount tomorrow.	17	I can't give you a ruling on
18	MS. NORCROSS: We have the	18	this. I am only the law clerk, and
19	judge's order. It has to do with the	19	not the appointed judge.
20	hour allocation, is the best I	20	But my reading of the letter
21	understand this.	21	is that the plaintiff is to be
22	The judge ordered 10 hours of	22	questioned for 10 hours, and I am
23	deposition time today and then	23	sure the judge would say that does
24 25	additional time tomorrow morning,	24	not include a lunch brake.
23	depending upon when Miss Mann needs	25	So we can call you back when
	Page 203		Page 205
	203	1	205
	203 to leave for her flight to Singapore.	2	205 she is off the bench.
3	203 to leave for her flight to Singapore. And we resolved earlier this	2 3	205
3 4	203 to leave for her flight to Singapore. And we resolved earlier this morning, she needs to leave about	2 3 4	205 she is off the bench. MR. UMOH: One defendant may depose her for 10 hours?
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2	doctor or social worker, psychiatrist, or	2	Q Had you ever felt these symptoms at
िर	something else?	3	any time prior to your first visit to Miss
. +	A If I can recall correctly, she was a	4	Buck?
5	licensed clinical social worker.	5	A You mean well, I have experienced
6	Q Were you referred to her by	6	those emotions throughout my lifetime.
7	anybody?	7	Q When was the most recent?
8	A No. I looked her up in the health	8	Well, did you ever receive treatment
9	insurance company website.	9	for these symptoms?
10	Q Where was her office?	10	A Yes. That's why I was going to Miss
11	A I saw her on 11th Street. It was a	11	Buck and Marlene.
12	street in the Village.	12	And I was confiding a lot in my
13	Q In Manhattan?	13	pastor at the time.
14	A Yes, in Manhattan.	14	Q You told me the first time you saw
15	Q When you first saw her, what were	15	anyone about your situation at work was in late
16	your complaints?	16	April, when you saw Miss Buck, correct?
17	A My complaints, just the emotional	17	A Yes.
18	distress I was going through, based on my	18	Q You just gave me a list of physical
19	discrimination at Plus One.	19	complaints you mentioned to Miss Buck on your
20	Q When was the first time you saw	20	first visit.
21	her?	21	Had you ever been treated for those
22	A From what I recall, late April. But	22	symptoms or complaints before that?
23	it should be reflected in the health insurance	23	A By a medical doctor?
24	records.	24	Q By anybody.
25	Q I have no records. I have to go by	25	A Yes, I have had headaches before,
L	Daga 215	I	D 047
<u> </u>	Page 215 215	1	Page 217
. 2	215	1 2	217
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	Case 1:07-cv-05691-NRB Documents	36-2	
1 2	is peppermint oil, and rub them on my temples.	1 2	220
	Q Had you experienced these headaches	3	Q For how long a time period?  A It had to coincide with when my
, +	or stomach problems before April of '06, when	4	insurance ended. I think it was the same week
5	you saw Miss Buck?	5	that I was no longer insured, health insurance,
6	A I had experienced those problems	6	by Plus One; so I am thinking I ended seeing her
7	throughout my lifetime.	7	by June 16, 2006.
8	Well, not consistent throughout my	8	Q And how many times, in total, did you
9	lifetime. It was not a chronic problem.	9	see her?
10	Q Periodically?	10	A I am taking a guess, about 10.
11	A Yes. Once in a blue moon, I would	11	Q Did she do anything different for you
12	have a headache.	12	on the other nine times you saw her than the
13	I have never been hospitalized.	13	first time you saw her? Did she just do intake,
14	Q What did Miss Buck do for you? I	14	listen to what you were saying?
15	don't want to know what she told you. What did	15	MR. UMOH: Objection.
16	she do for you on your first visit?	16	Q You tell me.
17	A From what I recall, on the first	17	A Her strategy seemed consistent.
18	visit, a lot of it was intake. She was like,	18	I mean, she would ask me questions,
19	okay, why are you here?	19	and she would offer questions as to, like post
20	A lot of times she was asking	20	different scenarios and try to get me to look at
21	information for clarification and trying to find	21	different things about myself.
22	out, why did I go and see her.	22	Q Do you have any pending appointments
23	Q Did she prescribe any medication to	23	with her?
24	you or recommend that you see any other persons	24	A No, I don't have any.
25	or doctors or therapists at that point?	25	Q Who is the next person you saw after
1		i	
<u>.</u>	Page 219		Page 221
<u>لــ</u> ـــ	219	1	221
2	219 A I don't recall if she did.	2	Miss Buck?
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